

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
vs.) Case No.: 4:15-cr-403-2 HEA (SPM)
)
CHARLES FLOWERS,)
)
 Defendant.)

FIRST MOTION TO CONTINUE SENTENCING

COMES NOW Defendant, Charles Flowers, by and through counsel, and hereby moves this Court to continue the trial presently scheduled for February 8, 2016 for a period of thirty (30) days. In support of this motion, Defendant states as follows.

1. Defendant's sentencing is set for July 12, 2016.
2. Counsel has not had sufficient time to prepare a sentencing memorandum on Defendant's behalf, largely as a result of motions, memoranda, responses, and replies all due within the last 30 days in the following cases: United States v. Jeffrey Johnston, 4:13-cr-379 CDP (E.D. MO 2013); United States v. Larry Honerkamp, 4:14-cr-403 RLW (E.D. MO 2014); United States v. Andrew Tillman, 3:16-cr-30041 MJR (S.D. IL 2016); United States v. Nathan Frazier, 2:15-cr-20029 SEM (C.D. IL 2015); United States v. Joseph Frazier, 2:15-cr-20029 SEM (C.D. IL 2015); and United States v. Ryan Kee, 2:14-cr-4065 SRB (W.D. MO 2014).
3. These matters, in tandem with counsel's regular court appearances, jail visits, and client meetings, have impeded counsel's ability to timely prepare a sentencing memorandum on Defendant's behalf.

4. In the absence of this memorandum, counsel cannot represent Defendant effectively at sentencing.

5. For this reason, Defendant files the instant motion.

6. Defendant, through counsel, has discussed this matter with assistant United States attorney Sirena Wissler. Ms. Wissler does not object to Defendant's request.

WHEREFORE, Defendant respectfully requests this Honorable Court continue the sentencing presently scheduled for July 12, 2016 for a period of thirty (30) days.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

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CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2016, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Sirena Wissler, assistant United States attorney.